

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLCOTT CITY, MD 21042

410-864-0300

August 29, 2018

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311

201-342-6665

Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York

BY ECF

Re: United States v. Kenner & Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine and *pro se* co-defendant Philip Kenner's (collectively "Defendants") oppositions to the government's Forfeiture Motion is due today, August 29, 2018. The forensic accountant appointed by the Court for Defendants will not complete his examination for another ten to fourteen days. Upon receipt of the report, Defendants can file their oppositions within one week. For this reason, Defendants respectfully request that their filing deadline be extended to September 21, 2018. The government, by Assistant United States Attorney Diane Leonardo, takes no positions as to this application but requests that any extension include the existing one month reply deadline. The proposed schedule will not affect the motion argument date set for November 2, 2018.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin

Sanford Talkin

Request granted.

cc: AUSA Diane Leonardo (by ECF)
AUSA Madeline O'Connor (by ECF)
AUSA Saritha Komatireddy (by ECF)
AUSA Matthew Haggans (by ECF)
Philip Kenner (by hand)

RECORDED
Joseph Bianco

Joseph F. Bianco
USDJ
Date: Sept. 4 20 18
Central Islip, N.Y.